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September 9, 2013

BY ECF

Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street, 8th Floor Mailroom
New York, New York 10007

Re: **U.S. v. Bonventre, et al., 10 Cr. 228 (LTS)**

Dear Judge Swain:

We represent defendant George Perez in the above matter, and write on his behalf, as well as on behalf of co-defendant Jerome O'Hara.

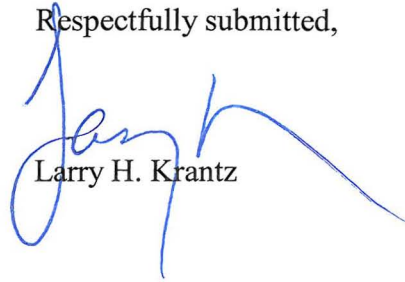
We write to supplement the motion *in limine* filed on behalf of all defendants by Andrew Frisch, which motion sought to exclude the testimony of various proposed government expert witnesses, due to the government's failure to provide proper expert disclosure under Rule 16. As set forth in that motion, for most of its expert witnesses, the government has simply ignored the requirements of Rule 16(a)(1)(G), and has failed to provide the defense with the opinions as to which they will testify, let alone the "bases and reasons for those opinions."

Specifically, we write to add John Sardone, the government's proposed handwriting analyst, to the list of witnesses as to whom the government has provided inadequate disclosure. As to Mr. Sardone, while his expert report *does* provide the conclusions as to which he will testify (unlike most of the other expert disclosure), the report fails in any respect to set forth the "bases and reasons for those opinions, and the witnesses qualifications," as required by Rule 16(a)(1)(G). Accordingly, we respectfully request that the testimony of Mr. Sardone be excluded, along with the testimony of the other expert witnesses set forth in the motion filed by Mr. Frisch.

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Thank you for your courtesy.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Larry H. Krantz', with a long, sweeping horizontal stroke extending to the right.

Larry H. Krantz

cc: Matthew Schwartz, AUSA (by ECF)